

# What requirements have to be fulfilled by adhesives that are used in the production of food contact materials made of wood?

## Information Leaflet by Technical Committee on Wood Adhesives (TKH)

Foodstuff commodities, which are also referred to as food contact materials, include articles that are used every day and which come into contact with foodstuffs. They are made of a variety of materials such as plastic, ceramic, glass, metal, paper, cardboard, fabrics or wood. And adhesives play a major role in their fabrication and use.

With the ever increasing number of special requirements placed on food contact materials, wood adhesive manufacturers frequently receive inquiries for adhesives that do not have any direct contact with the foodstuff when used as intended but are still a part of the foodstuff commodity. Possible applications could be: cutting boards, cheeseboards, tableware, cutlery, kitchen utensils, etc.

In Germany, there are no registration requirements for materials and articles intended to come into contact with food. Compliance with the relevant statutory requirements, which are colloquially referred to as "food-safe", must be safeguarded primarily by the manufacturer of foodstuffs in combination with the manufacturer of foodstuff commodities.

The generally accepted rules of good manufacturing practices for materials and articles, which are intended to come into contact with food, are defined in [GMP regulation \(EC\) 2023/2006](#). It introduces general principles for all members of the supply chain and stipulates that quality assurance and quality control systems are defined and implemented. All wood adhesives, which are intended to be used in the production of food contact materials, fall within the scope of this regulation. (For more information, see [TKPV Technical Briefing Note 3 "Good Manufacturing Practices" for Adhesives Used in the Manufacturing of Materials and Articles Intended to Come into Contact with Food](#))

The [EC Framework Regulation No. 1935/2004](#) on materials and articles that are intended to come into contact with food, provides the basis for a reliably high level of protection of human health and consumer interests. The manufacturer of the finished products bears responsibility for the fact that the materials and articles satisfy the statutory requirements set forth in Article 3 of the Framework Regulation:

*Materials and articles, including active and intelligent materials and articles, shall be manufactured in compliance with good manufacturing practice so that, under normal or foreseeable conditions of use, they do not transfer their constituents to food in quantities which could,*

- a) endanger human health, or*
- b) bring about an unacceptable change in the composition of the food, or*
- c) bring about a deterioration in the organoleptic characteristics thereof.*

Article 5 of the Framework Regulation makes reference to Annex I, which lists materials and articles, for which individual measures can be granted, e.g., specific provisions and quality-related specifications. While adhesives are listed in Annex I, there are currently no individual measures for them.

According to Article 16 of EC Framework Regulation, the "Declaration of Compliance" is a written assurance that the foodstuff commodity complies with the applicable regulations. Such a document is only mandatory if it is prescribed in the so-called individual measures. Article 16, moreover, specifies that the declarations of compliance must be based on suitable documents which verify conformity with the regulations. These documents are to be maintained and made available to the competent authorities when requested.

The most important individual measures under the Framework Regulation include the [Regulation \(EU\) No. 10/2011 on Plastic Materials and Articles Intended to Come into Contact with Food](#). This regulation prescribes an overall migration limit of 60 mg/kg of foodstuff or 10 mg/dm<sup>2</sup> contact area. In addition to that, it also defines specific migration limits or maximum permitted quantities of residual substances in the material or article (QM). The regulation contains a positive list of monomers and other source substances and additives. Substances that are used exclusively for the fabrication of adhesives are not listed and thus adhesives do not fall within the scope of this regulation. If adhesive constituents are, however, listed, the relevant restrictions, such as specific migration limits (SML) or maximum permitted quantities of residual substances (QM), are to be observed.

There are currently no legally binding specifications or individual measures under EU law for adhesives that are used in food contact materials. In this respect, the marketing of such products for the production of foodstuff commodities is not subject to an obligation on issuing a declaration of compliance in accordance with Article 16 of the Regulation EC/1935/2004. Nonetheless, it is necessary to ensure that adequate information is exchanged over the entire value chain. The members of IVK - German Adhesives Association have thus agreed on a format for sharing relevant information:

#### IVK information format

for describing the status of adhesives under food legislation as used in the production of materials and articles, which are intended for coming into contact with food

1. Name and address of manufacturer
2. Date of issue
3. Description of adhesive
4. Information about substances used, for which the Regulation (EU) No. 10/2011 and/ or relevant national (e.g. [BfR recommendations](#)<sup>1</sup>) or international (e.g. [U.S. FDA](#)) regulations contain restrictions
5. If necessary: Risk assessment of substances, for which there are no regulations or certification of the safety of the product by a specialist laboratory or institute under food legislation

For more information, see [TKPV Technical Briefing Note 1 "Guideline on Food Legislation Status of Adhesives Used in Manufacturing Materials and Articles Intended to Come into Contact with Food"](#).

In addition to that, the members of IVK - German Adhesives Association have agreed on an information format for describing the status of input materials for adhesives under food legislation. This format is described in detail in [TKPV Technical Briefing Note 2 "Guideline on Food Legislation Status of Adhesive Raw Materials for Adhesives Used in Manufacturing of Materials and Articles Intended to Come into Contact with Food"](#).

The European Association of Adhesives and Sealants Manufacturers (FEICA) has also published its own [Guidance for food contact status declaration for adhesives](#).

The information and tips provided in this information leaflet reflect to the best of our knowledge the current state of technology. They are only intended for information purposes and as a non-binding guideline. As a result, they cannot be used as a basis for deriving any warranty claims.

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<sup>1</sup> BfR: Germany's Federal Institute for Risk Assessment